

Cyndie M. Chang (SBN 227542)
Katherine L. Nichols (SBN 228893)
Audra L. Thompson (SBN 218479)
DUANE MORRIS LLP
865 South Figueroa Street, Suite 3100
Los Angeles, CA 90017-5450
Telephone: (213) 689-7400
Facsimile: (213) 689-7401
E-mail: cmchang@duanemorris.com
knichols@duanemorris.com
athompson@duanemorris.com

Attorneys for GLOBAL EXCEL
MANAGEMENT, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOHN MUIR HEALTH, a California non-
profit public benefit corporation,

Plaintiff,

v.

GLOBAL EXCEL MANAGEMENT, INC.,
a Canadian for-profit corporation, and DOES
1 THROUGH 25, inclusive,

Defendants.

Case No.: 4-14-cv-04226-DMR

Hon. Magistrate Judge Donna M.
Ryu

Related to: Case No. 4:14-cv-04236-
DMR

**STIPULATION FOR ENTRY OF
PROTECTIVE ORDER**

Plaintiff John Muir Health (“Plaintiff”) and Defendant Global Excel Management, Inc. (“Defendant”) (collectively referred to herein as the “Parties”), hereby stipulate through their respective counsel of record:

To expedite the flow of discovery materials, to facilitate the prompt resolution of disputes over confidentiality of discovery materials, to adequately protect the information the parties are entitled or obligated to keep confidential, to ensure that only materials the parties are entitled or obligated to keep confidential are subject to such treatment, and to ensure that the parties are permitted reasonably necessary uses of such materials in preparation for and in the conduct of trial, pursuant to Fed. R. Civ. P. 26(c), the Parties respectfully request that the Court enter the Proposed Protective

1 Order submitted concurrently herewith.

2 ATTESTATION: Pursuant to General Order 45, Part X-B, the filer attests that
3 concurrence in the filing of this document has been obtained from the signatories
4 thereto.

5 Dated: May 21, 2015

STEPHENSON, ACQUISTO & COLMAN

7 By: /s/ Karlene J. Rogers-Aberman
8 Karlene J. Rogers-Aberman
9 Attorneys for Plaintiff
10 REGENTS OF THE UNIVERSITY OF
CALIFORNIA

11 Dated: May 21, 2015

DUANE MORRIS LLP

13 By: /s/ Katherine L. Nichols
14 Katherine L. Nichols
15 Attorneys for Defendant
16 GLOBAL EXCEL MANAGEMENT,
17 INC.
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